

EXHIBIT R

Lee, Carol

From: Amiad Kushner <akushner@seidenlawgroup.com>
Sent: Monday, January 23, 2023 3:04 PM
To: Smith, Andrew C.; Xintong Zhang
Cc: Sant, Geoffrey; Lee, Carol
Subject: RE: Huzhou Chuangtai Rongyuan Investment Management Partnership et al v. Qin - Notice of Deposition

Andy,

Mr. Qin is available to be deposed at your office on Monday, January 30, 2023, starting at 11:00 am (Mr. Qin will be traveling from Long Island that morning, and thus cannot do 9:00 am). Please confirm whether the 11:00 am start time works. Please also confirm whether the deposition will be videotaped.

Just to confirm, Mr. Qin will need an interpreter to translate from Mandarin Chinese, as he does not speak English.

Finally, Mr. Qin objects to your deposition notice to the extent it purports to require him to submit to unspecified "further depositions" after the January 30, 2023 deposition. Absent Mr. Qin's agreement or a court order, Petitioners are entitled to a single deposition of Mr. Qin totaling up to seven hours. See FRCP 30(d)(1).

Regards,

Amiad

Amiad Kushner
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From: Smith, Andrew C. <andrew.smith@pillsburylaw.com>
Sent: Thursday, January 19, 2023 8:32 PM
To: Amiad Kushner <akushner@seidenlawgroup.com>; Xintong Zhang <xzhang@seidenlawgroup.com>
Cc: Sant, Geoffrey <geoffrey.sant@pillsburylaw.com>; Lee, Carol <carol.lee@pillsburylaw.com>
Subject: Huzhou Chuangtai Rongyuan Investment Management Partnership et al v. Qin - Notice of Deposition

Dear Amiad,

Attached please find a deposition notice for Mr. Qin. While the deposition is noticed for January 30, 2023 at 9:00 am, we are amenable to finding a mutually agreeable date and time if that one does not work for you and Mr. Qin.

Sincerely,
Andy

Andrew C. Smith | Partner

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